

United States District Court
STATE AND DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

Case Number:

V.

BRADY ANTHONY JOHNSON

12-MJ-150-TNL

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about March 28, 2012, in Hennepin County, in the State and District of Minnesota, defendant

BRADY ANTHONY JOHNSON, did knowingly, by force, violence, and intimidation, take from the person and presence of a victim teller approximately \$3,846 in United States currency belonging to and in the care, custody, control, management, and possession of the TCF Bank located in Minneapolis, Minnesota, the deposits of which were then insured by the Federal Deposit Insurance Corporation all

in violation of Title 18, United States Code, Section 2113(a).

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:
SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Sworn to before me, and subscribed in my presence,

March 29, 2012, 2:00 pm at

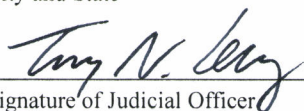
The Honorable Tony N. Leung
UNITED STATES MAGISTRATE JUDGE

Name & Title of Judicial Officer


Signature of Complainant

John J. Gainer
FBI

St. Paul, MN
City and State


Signature of Judicial Officer



STATE OF MINNESOTA)
) ss. AFFIDAVIT OF John J. Gainer
COUNTY OF HENNEPIN)

I, John J. Gainer, being first duly sworn under oath, depose and state as follows:

1. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI) and I am currently assigned to the Minneapolis Division Criminal Squad which is responsible for the investigation of bank robbery matters and other violent crimes. I have been a Special Agent since December 1995.

2. This affidavit is based on my training, experience, personal knowledge and observations in this investigation; upon my discussions with other law enforcement officers and agents directly involved in this investigation; and upon my review of official reports submitted in relation to this investigation. In connection with my official duties, I have participated in the investigation of the March 28, 2012, robbery of the TCF National Bank, located at 1444 West Lake Street, Minneapolis, Minnesota (hereinafter, "the bank"). I have obtained the following information through my investigation, other FBI agents, and Minneapolis Police Department (MPD) officers.

3. This affidavit is made for the purpose of establishing probable cause in support of a federal arrest warrant and therefore contains only a summary of relevant facts.

4. On March 28, 2012, at approximately 8:55 AM, BRADY ANTHONY JOHNSON waited in the vestibule between the outside doors and the interior locked doors the bank. After the interior doors were unlocked, JOHNSON entered the bank and walked to a small counter in front of the teller line. JOHNSON grabbed a savings deposit slip and continued to the teller counter.

5. JOHNSON approached the victim teller. In a very casual manner, JOHNSON said, "This is a robbery!" and pulled a previously written note out of his pocket. JOHNSON maintained control of the note with the tips of his fingers while the victim teller read the demand note. The note was written in shaky handwriting without punctuation or grammar.

6. When the victim teller did not react immediately, JOHNSON's demeanor become less casual and more aggressive. JOHNSON stated to the victim teller, "This isn't a joke. This is a robbery. Look at the note and give me all the fifties and hundreds. I have a gun and I will shoot you!" As JOHNSON stated he would shoot the victim teller, JOHNSON stepped back from the counter to reveal he possessed a heavy object in his jacket pocket, intimating that he had a gun.

7. Although the victim teller never saw a gun, she understood that JOHNSON had a gun in his pocket. The victim teller told JOHNSON she did not have any fifties or hundreds. JOHNSON told her, "Then

give me the twenties!" The victim teller took a stack of twenties, which included pre-recorded bait bills and an electronic Global Positioning System (GPS) tracking device. JOHNSON took the bills and put them in his jacket pocket. JOHNSON said to the victim teller, "Don't mess around. Don't hit the silent alarm. I will shoot you." JOHNSON told the victim teller that he would shoot her no less than four (4) times during the course of the robbery. The victim teller believed that JOHNSON would carry out his threat to shoot her.

8. JOHNSON looked over the counter and saw more bills in her case drawer and said, "Give me the rest of it, fives, tens and ones." The victim teller gave JOHNSON the remaining bills in her cash drawer. JOHNSON held the cash in his left hand and said, "Don't hit any alarm until after I leave the bank." JOHNSON then turned and departed the bank on foot eastbound.

9. The victim teller provided the following physical description of JOHNSON:

Race:	Black
Sex:	Male
Age:	38
Height:	6'2"
Weight:	280
Build:	Muscular with body fat over it
Hair:	Short Black Hair
Eyes:	Brown
Clothing:	Faded Black Hooded Sweatshirt

10. The audit determined the bank suffered a loss of \$3,846 in U.S. currency, including \$260 in bait bills. Video evidence was

derived from the bank's digital security surveillance system. TCF National Bank is a member of the Federal Deposit Insurance Corporation (FDIC) with certificate number 28330. The deposits of the bank were federally insured by the FDIC on the date of the robbery.

11. The electronic GPS tracking device was immediately activated and a live track was conducted by responding MPD officers. The tracking device indicated it was traveling near the location of West 24th Street and Harriet Avenue South in Minneapolis. Officers observed MTC bus number #7227 in the area and conducted a felony stop.

12. JOHNSON was the only person on the bus matching the description of the robber from the bank. JOHNSON was detained and a search for weapons was conducted. During the search, cash, bait bills, the electronic GPS tracking device, and the demand note were found on JOHNSON's person.

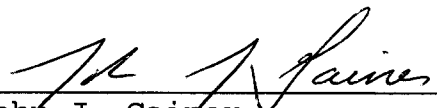
13. The victim teller and another employee from the bank were transported to the investigative detention location and positively identified JOHNSON as the bank robber. MPD officers placed JOHNSON under arrest and transported him to MPD Criminal Investigative Division (CID).

14. MPD officers attempted to interview JOHNSON. Before any questioning could begin JOHNSON stated, "I'm not making no statements until I have a lawyer because... Cause I know I'm going to prison for a long time...I know what I did...It's clear I robbed the bank

other than...what lead me up to me robbing the bank...I know I robbed the TCF Bank up on Lake Street and that's pretty much it." This statement was recorded. Based upon JOHNSON's request for an attorney, no further interview was conducted.


15. Based upon these facts there is probable cause to believe that BRADY ANTHONY JOHNSON committed bank robbery on March 28, 2012, at the TCF National Bank located at 1444 West Lake Street, Minneapolis, Minnesota, all in violation of Title 18, United States Code, Section 2113(a).

Further your Affiant sayeth not.



John J. Gainer
Special Agent,
Federal Bureau of Investigation

SUBSCRIBED and SWORN to before
me this 29th day of March, 2011.



The Honorable Tony N. Leung
United States Magistrate Judge